

What Changes May a Pharmacist Make to a Schedule II Prescription?

Recently adopted rules for the multiple issuances of Schedule II prescriptions by the Drug Enforcement Administration (DEA) appeared to conflict with the long standing DEA policy regarding what a pharmacist may change on Schedule II prescription after consultation with the prescribing practitioner.

In the preamble to the Rule, DEA stated that the “essential elements of the (Schedule II) prescription written by the practitioner (such as the name of the controlled substance, strength, dosage form, and quantity prescribed)...may not be modified orally.”

The DEA followed up with a statement “DEA recognizes the Resultant Confusion regarding this conflict and plans to resolve the matter through future rule making. Until that time pharmacists are instructed to adhere to state regulations or policy regarding those changes that a pharmacist may make to a schedule II prescription after oral consultation with the prescriber.”

Per the previous statements from the DEA the following three (3) items on a Schedule II prescription: **MAY NOT BE CHANGED**.

1. Name of the patient
2. Name of the drug (except for generic substitution permitted by state law)
3. Name of the prescribing practitioner (including signature)

Any other item, such as the strength of the drug, quantity of the drug, and directions for use, **MAY BE CHANGED PROVIDED**, the pharmacist

1. Contacts the prescribing practitioner and obtains verbal permission for the change; and
2. Documents on the prescription the following information;
 - a. Change that was authorized
 - b. Name or initials of the individual granting the authorization; and
 - c. Initials of the pharmacist

This policy statement was amended at the March 6, 2012 Board of Pharmacy meeting.